

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

TORREY ANDERSON

PLAINTIFF

VS.

CIVIL ACTION NO.: 23-431

**CITY OF JACKSON, MISSISSIPPI; JOHN DOE PERSONS DEFENDANTS
A – M; AND JON DOE ENTITIES N – Z**

**AMENDED RESPONSES TO CITY OF JACKSON'S RESPONSES TO
PLAINTIFF'S REQUESTS FOR ADMISSIONS**

COMES NOW, City of Jackson, Mississippi ("the City") by and through the undersigned counsel of record, and files its Amended Response to City of Jackson's Responses to Plaintiff's Requests for Admissions pursuant to the Mississippi Rules of Civil Procedure, to be answered as follows:

REQUEST FOR ADMISSIONS

REQUEST NO. 1: Please admit that the vehicle Willie Roach was operating collided with the vehicle Plaintiff was operating on March 7, 2023, on International Drive located in Rankin County, Mississippi.

RESPONSE TO REQUEST NO. 1: Denied as worded.

AMENDED RESPONSE TO REQUEST NO. 1: Denied.

REQUEST NO. 2: Please admit that Willie Roach was the operator of your vehicle, which was involved in an automobile accident with Plaintiff on March 7, 2023.

RESPONSE TO REQUEST NO. 2: Denied as worded.



AMENDED RESPONSE TO NO. 2: The City admits only that Willie Roach was driving a 2021 Ford pickup truck at the time of the incident on March 7, 2023. Otherwise Request No. 2 is denied.

REQUEST NO. 4: Please admit that, at the time of the accident with Plaintiff on March 7, 2023, Willie Roach was employed by you.

RESPONSE TO REQUEST NO. 4: Denied.

AMENDED RESPONSE TO NO.4: Denied as worded. Willie Roach was employed by the City. However, when the third-party manager was appointed by the interim stipulated order on November 29, 2022, Willie Roach became an agent working under the control of the third-party manager. The City's understanding is that Willie Roach is compensated by the City but JXN Water reimburses the City and for all practical purposes is a defacto employee of JXN Water. The City admits only, on March 7, 2023, Willie Roach was employed as an agent of the third-party manager.

REQUEST NO. 5: Please admit that, at the time of the accident with Plaintiff on March 7, 2023, Willie Roach was acting in the course and scope of his employment with you.

RESPONSE TO REQUEST NO. 5: Denied.

AMENDED RESPONSE TO REQUEST NO. 5: The City admits only, at the time of the incident, Willie Roach was under the management and control of the third-party manager. See Interim Stipulated Order pg. 7 section IV, 5(a); pg. 8 section 6; and pg. 9 section e – f.

REQUEST NO. 8: Please admit that you were the owner of the vehicle driven by Willie Roach on the date of the accident in question and which collided with Plaintiff.

RESPONSE TO REQUEST NO. 8: Denied as worded.

AMENDED RESPONSE TO REQUEST NO. 8: Denied as worded. Per the uniform crash report, Willie Roach was operating a City of Jackson vehicle, but the City of Jackson vehicle did not collide with Plaintiff. The City admits only, pursuant to the Interim Stipulated Order, Willie Roach was operating a City vehicle within the performance of duties associated with the Stipulated Order.

REQUEST NO. 9: Please admit that Willie Roach had your authority/permission to operate your vehicle at the time of the collision with Plaintiff.

RESPONSE TO REQUEST NO. 9: Denied.

AMENDED RESPONSE TO REQUEST NO. 9: Denied. The City admits only Willie Roach was acting under the authority and permission of JXN Water at the time of the collision pursuant to the Interim Stipulated Order. See pg. 8 section 6 of the Interim Stipulated Order.

REQUEST No.15: Please admit that you were the owner of the white, 2021 Ford truck, VIN# 1FDN7ANZNDFO6402, which was involved in an automobile accident with Plaintiff on March 7, 2023.

RESPONSE TO REQUEST NO. 15: The City is without sufficient information to admit or deny based on the information known or readily obtainable after a reasonable inquiry. Therefore, denies the same.

AMENDED RESPONSE TO REQUEST NO. 15: Admitted.

REQUEST NO. 30: Please admit that you were the owner of the utility trailer, which was involved in an automobile accident with Plaintiff on March 7, 2023.

RESPONSE TO REQUEST NO. 30: The City is without sufficient information to admit or deny based on the information known or readily obtainable after a reasonable inquiry. Therefore, denies the same.

AMENDED RESPONSE TO REQUEST NO. 30: Admitted.

RESPECTFULLY SUBMITTED, this the 9th day of February 2024.

CITY OF JACKSON, MISSISSIPPI

By: /s/Keyona Henry
Keyona Henry, MSB No. 106246
DEPUTY CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY

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Certificate of Service

I, Keyona Henry, one of the attorneys for the City of Jackson, do hereby certify that I have this day delivered, via electronic mail, a true and correct copy of the above and foregoing document, to the following:

All Counsel of Record.

Dated: February 9, 2024

/s/Keyona Henry
Keyona Henry